

1 **BASKIN RICHARDS PLC**

2 2901 N. Central Avenue, Suite 1150

3 Phoenix, Arizona 85012

4 Telephone No. 602-812-7979

5 Facsimile 602-595-7800

6 E-mail: alan@baskinrichards.com

7 mmilovic@baskinrichards.com

8 Name and State Bar No.: Alan Baskin #013155

9 Mladen Z. Milovic #035560

10 *Attorney for Defendant*

11 **IN THE UNITED STATES DISTRICT COURT**

12 **FOR THE DISTRICT OF ARIZONA**

13 United States of America,

14 Plaintiff,

15 vs.

16 David Allen Harbour,

17 Defendant.

18 **Case No. CR-19-00898-PHX-DLR(DMF)**

19 **UNOPPOSED MOTION TO EXTEND
DEADLINE FOR RULE 16, RULE 26.2,
AND EXPERT WITNESS
DISCLOSURES**

20 **(First Request)**

21 Defendant David Allen Harbour respectfully requests this Court to extend the deadline
22 for Defendant's Rule 16, Rule 26.2, and expert witness disclosures (the "Disclosures") from
23 May 15, 2020 to June 15, 2020. Due to numerous scheduling conflicts, the impact of COVID-
24 19 on the access to certain sources of information, and personal circumstances, Mr. Harbour
25 has not had the opportunity to finalize the Disclosures. Kevin Rapp, on behalf of the United
26 States of America, does not object to extending the deadline for Mr. Harbour's Disclosures to
27 June 15, 2020.

28

....

1 RESPECTFULLY SUBMITTED this 12th day of May, 2020.
2
3

4 BASKIN RICHARDS PLC
5

6 /s/ Alan S. Baskin

7 Alan Baskin

8 Mladen Z. Milovic

9 2901 N. Central Avenue, Suite 1150

10 Phoenix, Arizona 85012

11 *Attorney for Defendant*
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BASKIN RICHARDS PLC
2901 N. Central Avenue, Suite 1150
Phoenix, Arizona 85012
Telephone 602-812-7979
Facsimile 602-595-7800

BASKIN RICHARDS PLC
2901 N. Central Avenue, Suite 1150
Phoenix, Arizona 85012
Telephone 602-812-7979
Facsimile 602-595-7800

CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF system for filing to:

Kevin M. Rapp
U.S. Attorney's Office
40 N. Central Ave., Suite 1800
Phoenix, AZ 85004
Attorneys for Plaintiff

/s/ Cristina McDonald